

ORDER# 42001

SRF 02145

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.

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March 6, 1995

95-RF-02145

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DISCUSSION ON THE POSSIBLE CHANGES TO THE SITE-WIDE EXPOSURE FACTORS AND EXPOSURE SCENARIOS - SGS-073-95

Action: Please send the following information to the agencies

On February 21, 1995, EG&G and the Department of Energy, Rocky Flats Field Office (DOE, RFFO) met with representatives of the Environmental Protection Agency (EPA), Region VIII, and the Colorado Department of Public Health and Environment (CDPHE) to discuss possible changes to the site-wide exposure factors and exposure scenarios established for use in Rocky Flats Environmental Technology Site (Site) Human Health Risk Assessments (HHRA). The following are some of the major issues discussed during the meeting. The attendees deferred concurrence pending review by Colorado Department of Public Health management.

1. The DOE-sponsored Future Site Uses Working Group (FSUWG) has been discussing possible future land use scenarios for the buffer zone and are leaning towards a recommendation for "open space" uses. Bonnie Lavelle of the Environmental Protection Agency, Region VIII, recommended that the future on-site residential land use scenario be dropped from current and future risk assessments, in accordance with the policy of the EPA to recommend the reasonable maximum exposure (RME) for driving the Human Health Risk Assessments land use scenario. The reasonable maximum exposure is based on the preliminary land use maps from the Future Site Uses Working Group "Draft Alternatives" document (January 1995). It was the Environmental Protection Agency's position that the terms of the agreement to resume work on Rocky Flats Environmental Technology Site risk assessments were for EG&G Rocky Flats, Inc., to use the residential land use scenario in the Colorado Department of Public Health and Environment Conservative Screen, after which a more reasonable maximum exposure would be identified for the Human Health Risk Assessment's (See attachment). The Colorado Department of Public Health and Environment wanted to confer with management. Written agreement has been received from the Colorado Department of Public Health and Environment, but not from the Environmental Protection Agency.
2. Concern was expressed by EG&G and the Environmental Protection Agency that EG&G personnel were not interacting with the Future Site Uses Working Group. Norma Castaneda (DOE, RFFO) agreed to talk to her management about facilitating such interaction. It was noted that the Future Site Uses Working Group meetings are open to the public, the next one is March 9, 1995, at 6:00 p.m., in Boulder.
3. The addition of an open space recreational scenario and the ecological researcher scenario were discussed. The Environmental Protection Agency requested that an open space scenario be added to all on-site HHRA's. This has not been a requirement in the past. Preliminary parameter tables comparing exposure factors used for recreational scenarios at other National Priorities List (NPL) sites and data from user surveys on Boulder County open space were distributed and

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discussed. No decisions were made on exposure parameters, pending a meeting with Jefferson County open space personnel to collect information available from use surveys. The open space recreational scenario will be based on the Boulder and Jefferson County open space surveys and is expected to be transmitted to DOE, RFFO the first week in March. Programmatic risk-based preliminary remediation goals will follow shortly thereafter. It was agreed that an expanded discussion of the rationale for the ecological researcher scenario will be provided for each on-site Operable Unit.

4. The Environmental Protection Agency proposed that off-site residential receptors not be included in each Operable Unit-specific Human Health Risk Assessment, except for Operable Unit 3, but be addressed in the site-wide risk assessment agreed to in the Interagency Agreement (IAG). It was decided that the off-site receptors would be retained by Operable Unit 2, since EG&G has never received written direction or comments to remove these receptors. The Environmental Protection Agency stated that in comments on the Operable Unit 2 Draft Remedial Investigation, it will be recommended that off-site residential receptors be removed from the final document. The Colorado Department of Public Health and Environment wanted to confer with management on this issue before agreeing. Written agreement has been received from the Colorado Department of Public Health and Environment.
5. The issue of a complete pathway for beef ingestion was discussed and it was agreed that this scenario, if found to be complete, would only apply to Operable Unit 3. EG&G stated that personal communications with local officials and others indicated that the few cattle present eat little local vegetation and receive large amounts of supplemental feed. A Colorado Department of Public Health and Environment representative indicated that she wanted to see an expanded discussion of this issue and would like local ranchers such as the McKay brothers to be interviewed to confirm EG&G's conclusions. The DOE, RFFO representative and EG&G agreed to include this discussion in the response to the agencies comments on Operable Unit 2 Exposure Assessment Technical Memorandum and in the Operable Unit 3 Human Health Risk Assessment.
6. The Environmental Protection Agency stated that the mining scenario could be dropped from consideration in the Human Health Risk Assessments for all Operable Units, with the possible exception of Operable Unit 1.1, based on the Future Site Uses Working Group's "Draft Alternatives" document (January 12, 1995). However, it was decided to have additional discussions with personnel from Western Aggregates to verify that insufficient alluvium is available for mining at Rocky Flats Environmental Technology Site. The Colorado Department of Public Health and Environment wanted to confer with management. Written agreement has been received from the Colorado Department of Public Health and Environment but not from the Environmental Protection Agency.

Due to this meeting it is our understanding that DOE, RFFO wants the onsite recreational scenario added to all buffer zone operable units. The recreational scenario is being developed and approved in parallel with the Operable Unit 2 Human Health Risk Assessments. The draft risk assessment may, therefore, not fully incorporate all DOE, RFFO, the Environmental Protection Agency, and the Colorado Department of Public Health and Environment comments with regard to the recreational scenario. All other exposure scenarios will not change until written direction is received from DOE, RFFO to do so.

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In addition to the above issues, several pathway-specific exposure factors were agreed upon by those in attendance. The site-wide exposure factors tables are currently being updated and will be distributed to the DOE, RFFO and EG&G subcontractors for their use in Human Health Risk Assessment, as soon as they become available.



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